

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**JESSICA JONES, MICHELLE VELOTTA,**  
and **CHRISTINA LORENZEN** on Behalf of  
Themselves and All Others Similarly Situated,

**Plaintiffs,**

v.

**Varsity Brands, LLC, Varsity  
Spirit, LLC, Varsity Spirit Fashion  
& Supplies, LLC, U.S. All Star  
Federation, Inc., Jeff Webb,  
Charlesbank Capital Partners  
LLC, and Bain Capital Private  
Equity,**

**Defendants.**

Case No. 2:20-cv-02892-SHL-cgc

---

**PLAINTIFFS' MOTION REQUESTING HEARING ON MOTIONS TO COMPEL  
DISCOVERY RESPONSES FROM DEFENDANTS Varsity Brands, LLC;  
Varsity Spirit, LLC; Varsity Spirit Fashion & Supplies, LLC; Jeff  
Webb; Charlesbank Capital Partners LLC; and Bain Capital Private  
Equity (ECF Nos. 100, 101, 102, & 103)**

---

Pursuant to Tennessee Western District L.R. 7.2(d), Plaintiffs respectfully request an oral hearing regarding their four Motions to Compel Discovery Responses from Defendants Varsity Brands, LLC; Varsity Spirit, LLC; Varsity Spirit Fashion & Supplies, LLC (collectively, the “Varsity Defendants”) (ECF No. 100), Bain Capital Private Equity (ECF No. 101), Charlesbank Capital Partners LLC (ECF No. 102); and Jeff Webb (ECF No. 103) (collectively “Motions”).<sup>1</sup> Plaintiffs assert that an oral hearing would be helpful to the Court to answer any questions the Court may have regarding issues that have been resolved and those that remain in dispute. Plaintiffs believe oral argument would also assist the Court as it would allow Plaintiffs to clarify

---

<sup>1</sup> Plaintiffs did not file a motion to compel against Defendant U.S. All Star Federation, Inc. (“USASF”).

differences between discovery in this case and that in the Related Actions,<sup>2</sup> and to explain the necessity of the productions sought.

Plaintiffs met and conferred extensively with the Defendants prior to the filing of their Motions. Plaintiffs respectfully request that the Court schedule a hearing to allow the parties to articulate their positions on the outstanding issues for the Court's consideration.

Dated: October 8, 2021

Respectfully submitted,

By: /s/ Van Turner  
Van Turner

Van Turner (TN Bar No. 22603)  
**BRUCE TURNER, PLLC**  
2650 Thousand Oaks Blvd., Suite 2325  
Memphis, Tennessee 38118  
Telephone: (901) 290-6610  
Facsimile: (901) 290-6611  
Email: vturner@bruceturnerlaw.net

---

<sup>2</sup> "Related Actions" refers to *Fusion Elite All Stars, et al. v. Varsity Brands, LLC, et al.*, 2:20 cv-02600-SHL-cgc (W.D. Tenn.), filed with this Court on August 13, 2020, and *American Spirit and Cheer Essentials, Inc., et al. v. Varsity Brands, LLC, et al.*, 2:20-cv-02782-SHL-atc, transferred to this Court on October 27, 2020.

Joseph R. Saveri\*  
Steven N. Williams\*  
Ronnie Seidel Spiegel\*+  
Kevin E. Rayhill\*  
Elissa A. Buchanan\*  
Anna-Patrice Harris\*  
**JOSEPH SAVERI LAW FIRM, LLP**  
601 California Street, Suite 1000  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
Email: jsaveri@saverilawfirm.com  
swilliams@saverilawfirm.com  
rspeigel@saverilawfirm.com  
krayhill@saverilawfirm.com  
eabuchanan@saverilawfirm.com  
aharris@saverilawfirm.com

Daniel E. Gustafson  
Daniel C. Hedlund  
Daniel J. Nordin  
Ling S. Wang  
**GUSTAFSON GLUEK PLLC**  
Canadian Pacific Plaza  
120 South Sixth Street, Suite 2600  
Minneapolis, MN 55402  
Telephone: (612) 333-8844  
Facsimile: (612) 339-6622  
Email: dgustafson@gustafsongluek.com  
dhedlund@gustafsongluek.com  
dnordin@gustafsongluek.com  
lwang@gustafsongluek.com

Richard M. Paul III\*  
Sean R. Cooper\*  
**PAUL LLP**  
601 Walnut, Suite 300  
Kansas City, Missouri 64106  
Telephone: (816) 984-8100  
Email: rick@paulllp.com  
sean@paulllp.com

Jason S. Hartley\*  
**HARTLEY LLP**  
101 West Broadway, Suite 820  
San Diego, CA 92101  
Telephone: (619) 400-5822  
Email: hartley@hartleyllp.com

*\* Admitted pro hac vice*  
*+Located in Washington State*

*Attorneys for Individual and Representative Plaintiffs*